

EXHIBIT E

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
PRESCRIPTION OPIATE)
5 LITIGATION,) Case No.
1:17-MD-2804
6 THIS DOCUMENT RELATES TO) Hon. Dan A.
ALL CASES) Polster
7)
8)
9)

10 Wednesday, January 23, 2019
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15 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
16 CONFIDENTIALITY REVIEW
17 — — —
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21 Videotaped Deposition of SUSANNE
22 HILAND, held at 4206 South J.B. Hunt Drive,
23 Rogers, Arkansas, commencing at 8:25 a.m., on
24 the above date, before Debra A. Dibble,
25 Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

26 GOLKOW LITIGATION SERVICES
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29
30

1 reporter today is Debbie Dibble and
2 she will now please swear in the
3 witness.

4 SUSANNE HILAND,
5 having first been duly sworn, was examined
6 and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. INNES:

9 Q. Good morning, Ms. Hiland. My
10 name is Michael Innes. We met yesterday,
11 where you sat as a corporate designee for
12 Walmart and provided testimony.

13 Some of the questions I'm going
14 to ask you up front might sound redundant as
15 to the questions you were asked yesterday,
16 but I want to have a complete record. So
17 I'll preface all of my questions with -- with
18 that.

19 You do understand you're under
20 oath today; right?

21 A. Yes.

22 Q. And you might have to speak up
23 for the folks to hear on the phone. I know
24 yesterday there were some complaints after
25 that it was difficult to hear all of us in

15 A. The recertification of our
16 distribution center for the VAWD
17 certification.

18 Q. And what is the -- which
19 distribution center in particular?

20 A. I believe at this time, this
21 was recertification, so all of them?

22 I -- I'd have to check their
23 certification dates, but all of our
24 distribution centers were VAWD certified. I

█ [REDACTED]

2 Q. Okay. I mean, at this time,
3 can we agree that the 6045 was VAWD
4 certified?

5 A. Yes.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

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■ [REDACTED] [REDACTED]

■ [REDACTED]

8 Q. (BY MR. INNES) Did you come to
9 learn what VAWD would consider to be
10 acceptable programs?

11 A. Our pharmacy -- our
12 distribution centers were reaccredited. So
13 we would have met the criteria required by
14 the VAWD certification. At no time in this
15 process were we unaccredited. The point of
16 this was to make sure that we were prepared
17 and had as much information as possible to
18 prepare for that recertification process.

19 Q. How long did that
20 recertification process take?

21 A. I think in this case there
22 was -- I think there were some delays as
23 we -- again, because there were additional
24 documentation requirements. I don't remember
25 specifically what those were. I think it was

1 a longer recertification process in this time
2 frame.

3 Q. What do you mean by
4 "documentation requirements"?

5 A. So documenting practices in --
6 in a policy that could be reflected and
7 inspected by the VAWD inspector.

8 Q. Okay. So at the time of the
9 reapplication process, did Walmart have its
10 practices documented in a policy that could
11 be reviewed by the VAWD inspector?

12 MS. TABACCHI: Object to the
13 form.

14 THE WITNESS: As I recall,
15 there were -- there were written
16 policies memorialized around practices
17 that we had in place in this time
18 frame as a result -- to meet those
19 recertification -- those new
20 recertification requirements.

21 MS. TABACCHI: Mike, before you
22 get to another document, can we take
23 another quick break?

24 I just don't want to get -- I
25 want to catch you before you start